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November 3, 2021

National Advisory Committee on Racial, Ethnic, and Other Populations
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Dear National Advisory Committee Members:

On behalf of NALEO Educational Fund, I write to provide comments to the National Advisory Committee on Racial, Ethnic, and Other Populations (NAC) on several Census policy issues in connection with the NAC's Fall Virtual Meeting. NALEO Educational Fund is the nation's leading nonprofit organization that facilitates the full participation of Latinos in the American political process, from citizenship to public service. Our Board members and constituency encompass the nation's more than 6,800 Latino elected and appointed officials, and include Republicans, Democrats, and Independents. NALEO Educational Fund is a national leader in Census outreach, community education and policy development. Since the 1990 Census, our organization has conducted outreach campaigns to promote the full and accurate count of the Latino community. Together with media and community-based organizational partners, we led the iHAGASE CONTAR! ("Make Yourself Count!") and iHAZME CONTAR! ("Make Me Count!") campaigns to drive response to the 2020 Census through dissemination of community education materials; promotion of a toll-free Census information hotline staffed by bilingual operators; technical assistance for community groups; and a robust social media and advertising campaign.

In addition, NALEO Educational Fund is a leading expert on Census policy development, with a long record of service on the Bureau's previous National Advisory Committees. The organization serves as co-chair of the Leadership Conference on Civil and Human Rights' Census Task Force, a Steering Committee member of the Census Counts Campaign, and the co-chair of the National Hispanic Leadership Agenda's Census Task Force. We also work closely with our Latino elected and appointed official constituency and our community partners on Census policy and outreach, and we are extremely familiar with their data needs. Our organization itself uses Census data for a variety of research and program efforts. Thus, the ability to obtain complete, relevant, and accessible Census data is critical to all our work.

In our comments, we first highlight the growing evidence of a potential undercount of Latinos and children in Census 2020, and our recommendations for a thorough evaluation by the Bureau of data quality indicators that would inform our understanding of this potential undercount. We then provide our recommendations regarding the need for the Bureau to prepare for a comprehensive assessment of the impact of an undercount on the Latino community, should it determine one has occurred. In addition, we recommend that the Bureau begin to consider options available to ameliorate such an undercount.

I. Growing Evidence of Potential Undercount of Latino Community and Children in Census 2020 and Bureau's Evaluation and Assessment Activities

In the wake of the release of the Census 2020 apportionment and redistricting data, there is growing evidence of a potential undercount of Latinos and young children in Census 2020. The April apportionment data showed that the nation's overall growth between 2010 and 2020 was the second-slowest of any decade in our nation's history. We also saw evidence of a potential undercount in these

data when states with significant Latino populations which were projected to gain congressional seats either failed to do so (Arizona) or gained fewer seats than projected (Florida and Texas).

In addition, after the August release of Census 2020 redistricting data, demographer Dr. William O'Hare compared these data with estimates from the Bureau's Demographic Analysis. His initial research suggests that Census 2020 may have missed 832,000 (4.4 percent) Latino youth (age 0–17), compared to 391,000 (2.1 percent) in 2010.

On November 1, the Urban Institute published research which used simulations to estimate Census 2020 undercounts of various population groups. The research estimated that there was a greater undercount of Latinos and very young children (age 0–4) in Census 2020 than there was in Census 2010. While the Urban Institute acknowledged that there are data limitations in its estimates and methodology, its research is another indicator of a potential undercount of the Latino community and other population groups in Census 2020.

Given the growing evidence of a potential undercount of various population groups in Census 2020, we recommend that the Bureau continue conducting evaluations and providing data quality indicators that will help inform our understanding of this potential undercount. We very much appreciate that the Bureau has provided extensive information about operational quality metrics, and has attempted to do so in a manner that is accessible to stakeholders. In this connection, we note that the American Statistical Association's Task Force on 2020 Census Quality Indicators and other data experts have highlighted the need for operational metrics at lower levels of geography and for subgroups of the population. In addition, we urge the Bureau to go beyond its presentation of these metrics, and provide analysis of their implications for a complete and accurate enumeration of the population in Census 2020.

We also urge the Bureau to continue to engage data experts, advocates, and other stakeholders as it moves forward with the Post-Enumeration Survey (PES), demographic analysis, and other evaluations and assessments of Census 2020 data quality. We encourage the Bureau to keep stakeholders informed about any challenges it has encountered in conducting and evaluating the PES, the impact of those challenges on the quality of its undercount estimates, and any issues regarding the comparability of 2022 PES estimates to those of previous Censuses. For example, the Bureau has indicated that it has experienced challenges in obtaining PES responses because of the pandemic. The Bureau must keep stakeholders informed about statistically significant differences between PES respondents and non-respondents, and the implications of these differences for its undercount estimates of Latinos and other population groups.

II. Preparations for a Comprehensive Assessment of the Implications of an Undercount of Latinos and Efforts to Ameliorate its Impact

Given the growing evidence of an undercount of Latinos and other populations group, the Bureau must be ready to carry out comprehensive assessment activities should the PES ultimate reveal a net undercount. This assessment should address the implications of an undercount for the full array of programs and purposes for which Census and other federal data are used. This would include an examination of the impact of the undercount on the Bureau's other data products, including the post-Census 2020 Population Estimates, the American Community Survey, and the Current Population Survey. The assessment should also cover the implications of an undercount of Latinos with regard to the broad range of uses of federal data, such as federal funding formulas, civil rights enforcement, and public and private sector planning and program decisions.

We also urge the Bureau to prepare to fully evaluate potential approaches to ameliorate the detrimental consequences of an undercount of Latinos and other population groups. In this connection, we believe the Census Bureau has made or is in the process of making decisions about how it will use Census 2020 data as the base for the Vintage 2021 Population Estimates. We have heard that the Bureau may be considering using an approach which augments Census 2020 data with other data or through other statistical methods to determine the base for these estimates. However, we lack specific information about whether the base will be adjusted, and the manner in which the Bureau intends to do so. Given the importance of the Population Estimates for a broad range of data purposes, including government funding formulas, we urge the Bureau to make public how it is using Census 2020 data for the Population Estimates base, the sources or approaches used to adjust those data, and the potential impact of any adjustments on Latino population data and federal funding for disadvantaged population groups.

In addition, we understand that the Bureau may be initiating discussions with other federal agencies about how to use its data for federal funding formulas. We urge the Bureau to provide stakeholders with specific information about the guidance it is providing other agencies, including information it may be providing about whether there are options available for ameliorating the impact of a potential undercount of different population groups in determining the amount and allocation of federal funds.

III. Conclusion

We greatly appreciate the Census Bureau's efforts to navigate the unprecedented challenges it has encountered in collecting and disseminating Census 2020 data, and we appreciate the guidance the NAC is providing for the Bureau's efforts. We also acknowledge the efforts of philanthropic institutions, nonprofit organizations, and many state and local governments who worked in partnership with the Bureau to promote a fair and accurate Census 2020 - but the challenges of 2020 were extraordinary and difficult to overcome. As the Bureau navigates evolving Census data quality issues, we look forward to continuing to work with the Bureau and the NAC to ensure that the Bureau takes into account the impact of these issues on the Latino community.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arturo Vargas', with a stylized flourish at the end.

Arturo Vargas
Chief Executive Officer